

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ABC CORPORATION I,
ABC CORPORATION II,

Plaintiffs,

v.

THE PARTNERSHIPS AND
UNICORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A,

Defendants.

Case No. 1:20-cv-4806

Judge Thomas M. Durkin

Magistrate Judge Jeffrey Cole

MOTION FOR RETURN OF BOND

Plaintiffs Hangzhou Chic Intelligent Technology Co., Ltd. and Unicorn Global, Inc. (collectively, “Plaintiffs”) respectfully move this Court for an order directing the return of the cash bonds paid in connection with now-lifted injunctions entered by this Court relating to Defendants Gyroor-US, Gyroor, Urbanmax, Fengchi-US, HGSM, Gaodeshang-US, and Gyroshoes. (collectively, “Defendants”).

The following briefing schedule in connection with this Motion to Return Bond was previously set by this Court on January 10, 2023 (Dkt. 634) and amended on February 8, 2023 (Dkt. 642): Defendants and Jiangyou-US are to file their Response to Motion for Return of Bond by April 21, 2023; Plaintiffs are to file their Reply for Motion for Return of Bond by April 25, 2023.

As this Court is aware, Plaintiffs posted bonds totaling \$250,000 (Dkt. 50, Receipt No. 4624246936; Dkt. 360, Receipt No. 4624261079) in connection with injunctive relief granted by this Court pursuant to Rule 65(c) of the Federal Rules of Civil Procedure. This Motion to Return

Bond is made on the grounds that Defendants have no viable claim for recovery on the bonds as a result of the injunctions issued. Accordingly, now that the injunctions entered by this Court are not in effect, it is no longer necessary for the bonds to provide the security required by Federal Rule of Civil Procedure 65(c) and Plaintiffs request that the funds be returned in full.

WHEREFORE, on the basis of the accompanying memorandum of law, and all pleadings, records, and documents on file herein, and upon such further oral argument and documentary evidence as may be presented to the Court at or before a hearing on this motion, Plaintiffs respectfully move the Court for an Order discharging and releasing, in full, the cash bonds in the amount of \$250,000 posted in this action.

Dated: March 28, 2023

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this March 28, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and service was perfected on all counsel of record and interested parties through this system, which will deliver a true and correct copy of the foregoing documents via CM/ECF.

Dated: March 28, 2023

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